

JAN 06 2020

JULIA C. DUDLEY, CLERK
BY: 
DEPUTY CLERK

Elliott Kline
117 Mesa Drive
Sinking Spring, PA, 19608

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

Sines and Others
Vs
Kessler and Others

Defendant Elliott Kline hereby responds to request to inform the Court of each step taken to *purge myself of contempt*.

To purge myself of contempt I have answered the First Set of Interrogatories and updated them to include the police information as requested by the Court's last communications with me. I've answered the Second Set of Interrogatories fully and completely, and I've completed the Request for Documents from the Plaintiffs. I've given over 3 phones in total to the Plaintiffs with their passcodes for discovery, and two of them have been told to me to have been "stolen". I have asked several times via email to the Plaintiffs for an update or status of the investigation on the phones and have not received anything back. I have handed over all the email addresses to the Third Party Discovery Vendor and they have confirmed to have been able to access and download the accounts.

In order to complete the Request for Documents I did the following: Once I was informed by my original counsel on steps to preserve documents I took the following steps: I listed out all the emails/social media/accounts I had access to and that I could remember. I searched through my emails for any additional account credential information. I searched the Google Drive of my email addresses I used for any documents related to the case. I made sure to keep the phones I used during Unite the Right and after to turn them over for discovery. I did not delete any text messages, emails, posts, or other documents during this time.

I believe I have completed all of the Plaintiff's and Court's requirements to purge myself of contempt and completed my discovery obligations.

I, Elliott Kline, based on reasonable inquiry, that the foregoing answers are true and correct to the best of my knowledge, information and belief. I verify under penalty of perjury that the foregoing is true and correct.

Dated: 1/4/2020



Elliott Kline